

CASE NO.: AM9-98-128
Serial No.: 09/523,639
July 20, 2005
Page 7

PATENT
Filed: March 10, 2000

Remarks

Reconsideration is solicited. Claims 1-4, 7, 9, 10, and 13-16 have been rejected under 35 U.S.C. §103 as being unpatentable over Adar et al., USPN 6,493,702 in view of Jammes et al., USPN 6,484,149, and Claims 5, 6, 11, and 12 have been rejected as being unpatentable over these two references in view of Khan, USPN 6,546,393.

Claim 1 now sets forth that at least one inlink includes information related to a source page and information related to a target page linked to from the source page as disclosed on page 9, lines 5-15. Claim 13 incorporates the limitations of Claim 14 and Claim 15 now incorporates the limitations of Claim 16. Claims 1-7, 9-13, and 15 remain pending.

Web page bookmarks have been relied on in Adar et al. as the claimed inlinks. However, being bookmarks pointing only to target pages, they do not also contain information on the source pages as now recited in Claim 1, nor is there any reason in Adar et al. to include such information in its bookmarks, which are just that. Claim 1 will not be further addressed.

Turning to Claims 7 and 13, the rejection alleges that the hyperlinks which are generated in Jammes et al. as a result of queries are "sibling" links, pointing to columns 45-47 of Jammes et al. without further elucidation. But Claim 7 does not recite "sibling links" in a vacuum. Rather, Claim 7 recites that the list of sibling links is generated based on a list of inlinks, with each sibling link being an outlink of one of the inlinks in the table. In Jammes et al., regardless of the propriety of equating its hyperlinks with sibling links, what is dispositive is that none of the relied-upon links are generated based on a list of other related links, but instead appear to be created from scratch in response to a query, see, e.g., col. 45, lines 49-55.

1053-39.AM46

CASE NO.: AM9-98-128
Serial No.: 09/523,639
July 20, 2005
Page 8

PATENT
Filed: March 10, 2000

Second and as important, there is not the remotest shred of a prior art reason to combine Jammes et al. with Adar et al. Adar et al. categorizes and ranks bookmarks from individual users that can be searched by keyword, col. 8, essentially conflating an Internet search corpus to the bookmark database for focussed searching. The bookmarked Web pages are thus the be-all and end-all in Adar et al. There is no reason to look for outlinks to the bookmarked pages, because, per Adar et al., the bookmarks themselves, having been designated by users, embody the user-centric preference base that can be used to "harness the power of the online community", summary and col. 9, lines 20-25. In keeping with Adar et al.'s teachings and suggestions, adding in outlinks to the bookmarks would only muddy the waters. Apart from that, nothing in Adar et al. suggests exploring outlinks to its bookmarked Web pages.

Jammes et al. cannot be used to supply the missing suggestion to combine, because the relied-upon URLs of Jammes et al. are generated as a *result of* a query, the very opposite of the relied-upon bookmarks of Adar et al., which are gathered *before* searching to facilitate search. Accordingly, even if Jammes et al. were to be combined with Adar et al. as proposed, Claim 7 would not result, but rather an odd and redundant arrangement in which bookmarked Web pages of Adar et al. would be searched and then the URLs of the searched pages would be regenerated using principles of Jammes et al. In other words, the relied-upon inlinks of Adar et al. would be searched to produce the exact same inlinks using the templates of Jammes et al., but no sibling links would be derived.

Applicant notes that the limitation of Claim 16 has not been addressed, and indeed it must be avoided to maintain a rejection because nothing in Adar et al. appears to mention an inlink request time or a number of times each inlink is used to hyperlink a user computer to a Web page.

1003-39,AMM

CASE NO.: AM9-98-128
Serial No.: 09/523,639
July 20, 2005
Page 9

PATENT
Filed: March 10, 2000

Respectfully submitted,



John L. Rogitz
Registration No. 33,549
Attorney of Record
750 B Street, Suite 3120
San Diego, CA 92101
Telephone: (619) 338-8075

JLR:jg

1053-J9.AM44